

AFFIDAVIT OF DUE DILIGENCE

State of Tennessee

County of Western

Court

Case Number: 2:13-CV-2578

Plaintiff:

**MARY PHILLIPA SLEDGE, MARY JANE PIDGEON SLEDGE TRUST
AND PIDGEON SLEDGE FAMILY LIMITED PARTNERSHIP**

vs.

Defendant:

INDICO SYSTEM RESOURCES, INC. AND CLEAL WATTS, III

For:

PIETRANGELO COOK

6410 Poplar Ave., Ste. 190

Memphis, TN 38119

Received by Alliance Litigation Support, Inc. on the 31st day of August, 2013 at 10:00 am to be served on
CLEAL WATTS, III, 8926 FOREST HILLS BLVD., DALLAS, TX 75218.

I, JAMES W. SUTTON, being duly sworn, depose and say that on the **4th day of September, 2013 at 10:17 am, I:**

NON-SERVED the SUMMONS IN A CIVIL ACTION; CIVIL COVER SHEET; ATTACHMENT TO CIVIL COVER SHEET; COMPLAINT; EXHIBIT A. After due search, careful inquiry and diligent attempts was unable to serve on **CLEAL WATTS, III** for the reasons detailed in the comments below.

Additional Information pertaining to this Service:

8/2/2013 7:10 pm I attempted service of the above-referenced documents to Cleal Watts III at the address of 8926 Forest Hills Blvd., Dallas, TX 75218. I received no response at the door after repeated knocking and ringing the bell.

8/3/2013 9:40 am I again attempted service and received no response at the door. I waited for about 10 minutes hoping someone would eventually come to the door but did not receive a response.

8/5/2013 9:51 pm I again attempted service and the door was answered by a white female, approximately 55 years of age, 5'8, 175 lbs., with blonde hair. When asked if Cleal Watts was in she said "just a second," turned her back in the opposite direction, then immediately turned back and said "oh, he's not here." I asked her to give Mr. Watts my contact information and headed toward my vehicle. There was a truck at the residence with license plate number 62K ZJ9 registered to Cleal Watts. As I was taking notes in my vehicle, this female came outside and asked if there was anything else we needed then proceeded to speak at length about nothing relevant. She did say she would speak to Cleal that evening and that he would probably be back on Monday. At this point we were not given the authorization to serve these documents to anyone other than Cleal Watts III.

8/8/2013 1:20 pm Again attempted service with no response at the door. I did note a package on the front porch addressed to Mr. Cleal Watts III. The same truck was again parked at the residence.

8/12/2013 10:13 pm Again attempted service and found lights were on throughout the home. The vehicle registered to Cleal Watts was parked in the street and a truck with license plate number AL9 3244 registered to Sharon Debra Koper was parked in the drive. The same package addressed to Mr. Watts sat untouched on the porch.

8/17/2013 7:37 am I arrived at the residence to wait and watch for any activity or sighting of Cleal Watts III. The red Dodge truck with license plate 62K ZJ9 registered to Mr. Watts and the blue Dodge truck with license plate number AL9 3244 registered to Sharon Debra Koper were both parked at the residence. After waiting at the residence for approximately four hours without seeing any activity or movement, I walked to the neighbors house who was building a storage building in his backyard. This individual is described as a white male, approximately 20 years of age, 5'6, 160 lbs., and brown hair. I asked this gentleman about his neighbor and if he had any insight as to Mr. Watt's routines. He stated Mr. Watts rarely leaves the home. I asked if he would attempt to get Mr. Watts to the door. He agreed, walked to the residence and received no response after knocking on the door and ringing the bell. He suggested looking in the backyard as he "spends time there." I proceeded to the rear of the residence and saw no one. I went to the front door and knocked loudly and

AFFIDAVIT OF DUE DILIGENCE for 2:13-CV-2578

repeatedly for several minutes and rang the bell often with no response. I left the residence at 11:45 am.
8/31/2013 8:13 am Again attempted service with no response. Mr. Watt's vehicle was present. I attempted to speak to the next door neighbor again but also received no response.

9/2/2013 3:50 pm Again attempted service. I parked a block away and walked to the residence and still received no response at the door after repeated knocking and ringing the bell.

9/3/2013 9:20 pm Again attempted service with no response although the rear of the residence was well lit and Mr. Watt's truck was present.

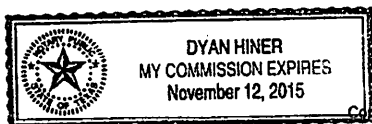
9/4/2013 10:17 am Again attempted service with no response at the door.

I have been able to confirm through three neighbors (Michael Lira at 8930, Barbara Loyd at 8927 and the young male who offered help) that this is the residence of Cleal Watts III and Debra Koper. All state Mr. Watts rarely leaves the residence and Ms. Koper keeps odd hours as well.

I certify that I am approved by the Supreme Court of Texas, Misc. Docket No. 05-9122 under rule 103 and 536(a) of the TRCP to deliver citations and other notices from any District, County and Justice Courts in and for the State of Texas. I am not less than 18 years of age, I am not a party to the above-referenced cause. I have personal knowledge of the facts and statements contained in this affidavit and each is true and correct. I am not interested in the outcome of the above-referenced cause

Subscribed and Sworn to before me on the 6TH
day of September, 2013 by the affiant
who is personally known to me.


NOTARY PUBLIC




JAMES W. SUTTON
SCH8248 EXP. 2/28/2014

Alliance Litigation Support, Inc.
1908 Kings Ct.
Flower Mound, TX 75028
(972) 221-4017

Our Job Serial Number: DAH-2013001125

AFFIDAVIT OF DUE DILIGENCE

State of Tennessee

County of Western

Court

Case Number: 2:13-CV-2578

Plaintiff:

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vs.

Defendant:

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For:

PIETRANGELO COOK
6410 Poplar Ave., Ste. 190
Memphis, TN 38119

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I, JAMES W. SUTTON, being duly sworn, depose and say that on the **4th day of September, 2013 at 10:17 am, I:**

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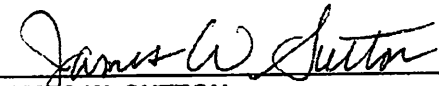
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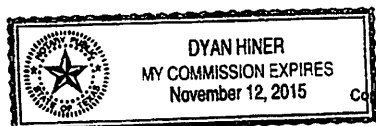
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NOTARY PUBLIC


JAMES W. SUTTON
SCH#248 EXP. 2/28/2014

Alliance Litigation Support, Inc.
1908 Kings Ct.
Flower Mound, TX 75028
(972) 221-4017

Our Job Serial Number: DAH-2013000798



AFFIDAVIT OF DUE DILIGENCE

State of Tennessee

County of Western

Court

Case Number: 2:13-CV-2578

Plaintiff:

**MARY PHILLIPA SLEDGE, MARY JANE PIDGEON SLEDGE TRUST
AND PIDGEON SLEDGE FAMILY LIMITED PARTNERSHIP**

vs.

Defendant:

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For:

**PIETRANGELO COOK
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I, Geoffrey Hiner, being duly sworn, depose and say that on the **1st day of August, 2013 at 2:30 pm, I:**

NON-SERVED the SUMMONS IN A CIVIL ACTION; CIVIL COVER SHEET; ATTACHMENT TO CIVIL COVER SHEET; COMPLAINT; EXHIBIT A. After due search, careful inquiry and diligent attempts was unable to serve on **INDICO SYSTEM RESOURCES C/O CLEAL WATTS, III, REGISTERED AGENT** for the reasons detailed in the comments below.

Additional Information pertaining to this Service:

8/1/2013 2:30 pm I attempted service of the above-referenced documents to Cleal Watts III, Registered Agent for Indico System Resources at the address of 5280 Trail Lake Drive, Suite 14. Fort Worth, TX 76133. There were no business suites open any longer. The retail suites below are still operating. I spoke to Jackie Brooks (employee of Salon World next door) @ 5292 Trail Lake Drive who states the business suites closed approximately ten years ago.

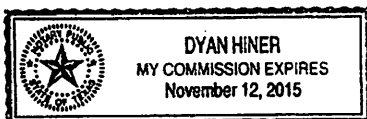
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NOTARY PUBLIC
Geoffrey Hiner
SCH 627 EXP 7/31/2014

**Alliance Litigation Support, Inc.
1908 Kings Ct.
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(972) 221-4017**

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Dyan Hiner
NOTARY PUBLIC

Geoffrey Hiner
Geoffrey Hiner
SCH 627 EXP 6/31/2014

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Our Job Serial Number: DAH-2013000797



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I, Geoffrey Hiner, being duly sworn, depose and say that on the **26th day of August, 2013 at 2:45 pm, I:**

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Additional Information pertaining to this Service:

8/22/2013 12:10 pm I attempted service of the above-referenced documents to Cleal Watts III, Registered Agent for Indico System Resources at the address of 8926 Forest Hills Blvd., Dallas, TX 75218. I received no response at the door after repeated knocking and ringing the bell. I spoke to the neighbor at 8930 Forest Hills Blvd. (Michael Lira) and a postal worker who both confirm Mr. Cleal Watts III resides at 8926 Forest Hills Blvd., Dallas, TX 75218.

8/26/2013 2:45 pm I returned to the residence with a photograph of defendant, Cleal Watts, III. I took this photo to Mr. Michael Lira at 8930 Forest Hills Blvd. and he confirmed this is the individual living at 8926 Forest Hills Blvd. He also stated he refers to him as "Doc." There was a package on the front porch addressed to Cleal Watts III.

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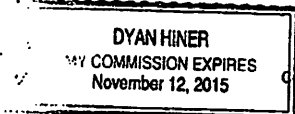
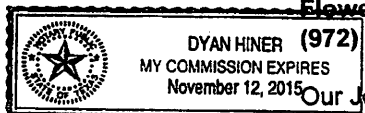
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SCH 627 EXP 7/31/2014

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